

Message

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Sent: 8/14/2018 10:47:02 PM
To: Smith, DavidW [Smith.DavidW@epa.gov]; Kozelka, Peter [Kozelka.Peter@epa.gov]
CC: Becker, Eric@Waterboards [Eric.Becker@waterboards.ca.gov]; Barker, David@Waterboards [David.Barker@waterboards.ca.gov]; Nunez, Adriana@Waterboards [Adriana.Nunez@Waterboards.ca.gov]; Gibson, David@Waterboards [David.Gibson@waterboards.ca.gov]; Smith, James@Waterboards [James.Smith@waterboards.ca.gov]
Subject: San Diego Water Board - Alternative Compliance Program - Stream Rehabilitation Component and Pollutant Credit System
Attachments: 2018-0808 DRAFT Alternative Compliance Program - Creek Restoration Component.docx

David S. (there are 3 David's on this email ☺) and Peter:

Here are the topic points David Gibson will be including in his remarks at the City of San Diego's Planning Commission Workshop on September 13, 2018. These are the topics we discussed earlier today. Also, attached is **DRAFT** Alternative Compliance Program (ACP) – Creek Restoration Component document Eric and I put together to help communicate what the San Diego Water Board considers and does not consider an instream treatment control BMP. Also, the document reiterates a few important Regional MS4 Permit requirements associated with ACP.

1. The San Diego Water Board supports using the restoration/rehabilitation of wetlands, streams, and other aquatic resources as candidate alternative compliance projects to meet the Regional MS4 Permit requirements for pollutant removal and hydromodification, subject to the following conditions:
 - a. Aquatic resource restoration/rehabilitation cannot be used to satisfy San Diego Water Board's compensatory mitigation requirements and storm water pollutant or hydromodification control requirement.
 - b. Alternative compliance may be proposed in accordance with Regional MS4 Permit requirements – which includes first demonstrating that the Priority Development Project (PDP) will maximize implementation of BMPs for source control, LID, and flow through treatment on-site
 - c. Any proposed storm water pollutant or hydromodification credit program should include a unit of trade that is clearly defined and scientifically defensible
 - d. Using these AC projects for water quality credit trading still requires proof of concept
 - e. The City of San Diego shall propose an initial pilot aquatic resource restoration/rehabilitation project to demonstrate what stream restoration and rehabilitation equates to in terms of the amount and type of pollutant reduction and hydromodification credits for an actual PDP Project where alternative compliance is proposed.
 - f. Start with simple offsite aquatic resource restoration/rehabilitation projects. Leave proposals for complex, multi-benefit credits from instream restoration projects for later when the water quality trading credit program is more mature. For example, a simple offsite project would be replacing hardened channel surfaces with natural surfaces, reestablishing aquatic and riparian functions and services.

If you have any questions or would like to discuss anything before your meeting on Friday please give me a call.